

Application Number 10/750,507  
Response to Office Action mailed December 14, 2007

### REMARKS

This Amendment is responsive to the Office Action dated December 14, 2007. Applicant has amended claims 1, 12, and 23, and has also added new claims 34-35. As a result, claims 1-35 are now pending.

#### Claim Rejection Under 35 U.S.C. § 103

In the Office Action, the Examiner rejected the following claims under 35 U.S.C. 103(a):

- (1) claims 1-8, 12-19 and 23-30 as being unpatentable over McLean et al. (U.S. Patent Publication No. 2003/0018506, hereinafter "McLean") in view of Loeb et al. (U.S. Patent No. 6,725,287, hereinafter "Loeb");
- (2) claims 9-10, 20-21 and 31-32 as being unpatentable over McLean in view of Loeb, as applied to claims 1-8, 13-19 and 23-30 above, in view of Zwilling et al. (U.S. Patent Publication No. 2004/0267828, hereinafter "Zwilling"); and
- (3) claims 11, 22 and 33 as being unpatentable over McLean in view of Loeb, as applied to claims 1-8, 13-19 and 23-30 above, in view of Yousefi'zadeh (U.S. Patent Publication No. 2004/0030739, hereinafter "Yousefi'zadeh").

Applicant respectfully traverses these rejections to the extent they may be considered applicable to the claims as amended. The applied references fail to disclose, or even suggest, the inventions defined by Applicant's claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed inventions.

Applicant has amended each of independent claims 1, 12, and 23. As now amended, each of these independent claims now require producing a plurality of view snapshots from a view, wherein each view snapshot corresponds to a complete representation of an individual event within the view. In claims 1 and 23, the recited view is a materialized view, and in claim 12, the recited view is an initial view. To support the rejection of claims 1, 12, and 23, the Examiner interpreted the diagrammatic views shown in FIGS. 25A-25C of McLean as view snapshots. Applicant disagrees with such interpretation, and submits that McLean fails to disclose, or even suggest, producing a plurality of view snapshots from a view, wherein each view snapshot corresponds to a complete representation of an individual event within the view, as required by claims 1, 12, and 23.

Application Number 10/750,507  
Response to Office Action mailed December 14, 2007

As noted above, the Examiner interpreted the diagrammatic views of object records shown in FIGS. 25A-25C as view snapshots. The Examiner also appeared to interpret the event matrix 400 of McLean as a view.<sup>1</sup> Applicant disagrees with these interpretations. The object records shown in FIGS. 25A-25C of McLean are stored in object database module 902. FIG. 25A is a diagrammatic view of a customer object record 908, FIG. 25B is a diagrammatic view of a product object record 909, and FIG. 25C is a diagrammatic view of a financial object record 910. Applicant submits that these diagrammatic views and corresponding object records are not snapshots of the event matrix 400, or view snapshots within the meaning of claims 1, 12, and 23. In other words, these diagrammatic views and corresponding object records are not produced from event matrix 400 (or event matrix 901 shown in FIGS. 24A-24B of McLean), as is required by Applicant's claims. Further, the diagrammatic views and corresponding object records do not each correspond to a complete representation of an individual event within the event matrix 400 or 901, as is also now required by the amended claims.

As is shown in the diagrammatic views of FIGS. 25A-25C McLean, object records stored in object database 902 include event relationship identifiers to "dynamically link appropriate events stored in the event matrix 901 with particular object records stored in the object database 902."<sup>2</sup> However, these event relationship identifiers for such object records are simply references to particular events stored in event matrix 901 of McLean. For example, FIG. 25A shows an example of a customer object record 908 that includes three separate event relationship identifiers "99-4127", "99-5201" and "99-6374", which are references to separate events stored in event matrix 901 (shown in FIGS. 24A-24B of McLean). The customer object record 908 itself, however, substantively includes only customer information (e.g., name, address, contact, other customer details).

Record 908 of McLean does not correspond to a complete representation of an individual event within event matrix 901. In fact, record 908 does not correspond to a complete representation of any event within event matrix 901, such as an order event, sales event, or payment event. Instead, record 908 only uses event relationship identifiers to refer to these events, wherein the events themselves are actually included and stored within event matrix 901.

<sup>1</sup> Page 3 of the Office Action dated December 14, 2007.

<sup>2</sup> See, e.g., page 19, paragraph [0246] of McLean.

Application Number 10/750,507  
Response to Office Action mailed December 14, 2007

In no way does record 908 correspond to a complete representation of any event within event matrix 901. For example, record 908 does not include any of the information 907a-907e for event "99-5201". Information 907a-907e is only included within event matrix 901 for this particular event. Record 908 includes only a reference to this event by using an event relationship identifier of "99-5201". Thus, record 908 includes references, or links, to events that are included within event matrix 901, but fails to include a complete representation of any of these events.

FIGS. 25B-25C show similar examples of event relationship identifiers contained within product object record 909 and financial object record 910, respectively. These event relationship identifiers are again simply references to events included within event matrix 901. Records 909 and 910 do not each correspond to a complete representation of any individual event within event matrix 901. Thus, Applicant submits that McLean fails to disclose, or even suggest, producing a plurality of view snapshots from a view, wherein each view snapshot corresponds to a complete representation of an individual event within the view, as required by claims 1, 12, and 23.

Loeb does not overcome the deficiencies of McLean. On page 5 of the Office Action, the Examiner asserted that Loeb teaches "at least one stream of event [sic] is received as output from a streaming database system" and "external to the database system and at least one stream of events is received from the streaming database". Applicant neither admits nor acquiesces that Loeb discloses, or even suggests, such features. Applicant does submit, however, that Loeb fails to disclose, or even suggest, producing a plurality of view snapshots from a view, wherein each view snapshot has an event identifier to uniquely represent an individual event within the view, as required by independent claims 1, 12, and 23.

Applicant further submits that the remaining applied references (Zwilling and Yousefi'zadeh) also fail to overcome the deficiencies of McLean. The remaining applied references also fail to disclose, or even suggest, producing a plurality of view snapshots from a view, wherein each view snapshot has an event identifier to uniquely represent an individual event within the view, as required by independent claims 1, 12, and 23.

Claims 2-11, 13-22, and 24-33 are dependent claims that each depend, either directly or indirectly, on one of independent claims 1, 12, or 23, respectively. For at least the reasons outlined above regarding these independent claims, Applicant submits that the applied references

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Application Number 10/750,507  
Response to Office Action mailed December 14, 2007

also fail to disclose, or even suggest, each and every element of dependent claims 2-11, 13-22, and 24-33. Applicant therefore requests withdrawal of the rejections to these claims.

For at least these reasons, the applied references fail to establish a prima facie case for non-patentability of Applicant's claims 1-33 under 35 U.S.C. 103(a). Withdrawal of these rejections is requested.

### New Claims

Applicant has added new claims 34-35 to the pending application, and submits that these new claims are supported by the original disclosure. The applied references fail to disclose, or even suggest, the inventions defined by Applicant's new claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed inventions. As one example, the applied references fail to disclose or even suggest producing a plurality of view snapshots from a materialized view, where each view snapshot has an event identifier to uniquely represent an individual event within the materialized view. For at least this reason, Applicant respectfully requests consideration and allowance of these claims.

### **CONCLUSION**

All claims in this application are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 50-1778. The Examiner is invited to telephone the below-signed attorney to discuss this application.

Date: March 14, 2008

By:



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